

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

RICHARD SIERRA; VERONICA GOOCH;)	
ROLAND SIERRA; LUCIA LLERAS DE)	
LABRADA; PRISCILLA LLERAS-BUSH, in)	
her personal capacity and as Personal)	
Representative of the ESTATE OF OLGA)	
ROMAGOSA; MÁRIAN MARIA DE LOS)	
ANGELES ROMAGOSA; and LISETTE)	C.A. No. 22-366 (MN)
ROMAGOSA SMYRNIOS,)	
)	
Plaintiffs,)	
)	
v.)	
)	
TRAFIGURA TRADING LLC, and)	
TRAFIGURA GROUP PTE LTD.,)	
)	
Defendants.)	

DEFENDANT TRAFIGURA TRADING LLC'S
MOTION TO DISMISS THE AMENDED COMPLAINT

Pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6), Defendant Trafigura Trading LLC (“TTL”) hereby moves to dismiss Plaintiffs’ Amended Complaint (D.I. 9) for lack of subject matter jurisdiction and failure to state a claim upon which relief can be granted. The grounds for this motion are set forth more fully in TTL’s Opening Brief, submitted herewith.

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June 10, 2022

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Plaintiffs,)	
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TRAFIGURA TRADING LLC, and)	
TRAFIGURA GROUP PTE LTD.,)	
)	
Defendants.)	

**[PROPOSED] ORDER GRANTING
DEFENDANT TRAFIGURA TRADING LLC'S
MOTION TO DISMISS THE AMENDED COMPLAINT**

At Wilmington this ____ day of _____, 2022, having considered Defendant Trafigura Trading LLC's Motion to Dismiss the Amended Complaint Under Fed. R. Civ. P. 12(b)(1) and 12(b)(6) for lack of subject matter jurisdiction and for failure to state a claim, the associated briefing and any other materials in the record, IT IS HEREBY ORDERED that the motion is GRANTED.

SO ORDERED.

United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2022, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on June 10, 2022, upon the following in the manner indicated:

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